

Adam P. Segal, Esq.  
Nevada Bar No. 6120  
Bryce C. Loveland, Esq.  
Nevada Bar No. 10132  
Christopher M. Humes, Esq.  
Nevada Bar No. 12782  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106-4614  
Telephone: (702) 382-2101  
Facsimile: (702) 382-8135  
Email: asegal@bhfs.com  
Email: bcloveland@bhfs.com  
Email: chumes@bhfs.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE  
TEAMSTERS LOCAL 631 SECURITY  
FUND FOR SOUTHERN NEVADA; BOARD  
OF TRUSTEES OF THE TEAMSTERS  
CONVENTION INDUSTRY TRAINING  
FUND,

Plaintiffs,

vs.

LIGHTNING EXHIBITS, LLC, a Florida  
corporation; TAMMY L. LASLEY, an  
individual,

Defendant.

Case No. 2:16-cv-03032-JAD-PAL

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
CUTOFF**

**SECOND REQUEST**

Plaintiffs, the Board of Trustees of the Teamsters Local 631 Security Fund for Southern Nevada and the Board of Trustees of the Teamsters Convention Industry Training Fund (collectively "Trust Funds"), by and through their counsel of record, Brownstein Hyatt Farber Schreck, LLP and Defendants, Lightning Exhibits, LLC and Tammy L. Lasley (collectively "Defendants"), by and through their counsel of record, Ogletree, Deakins, Nash, Smoak &

Stewart, P.C., hereby stipulate and agree that the discovery cutoff deadline in the Scheduling Order (ECF No. 20) be extended by fourteen days (14) from November 13, 2017, to November 27, 2017, and the dispositive motion deadline be extended sixty (60) days from December 13, 2017, to February 12, 2018. This is the second request to extend the discovery deadlines.

**A. DISCOVERY COMPLETED:**

1. 3/23/2017 Trust Funds' Initial Disclosures and Witness List.
2. 4/13/2017 Defendants' Initial Disclosures and Witness List.
3. 4/21/2017 Trust Funds' First Set of Admissions to Tammy Lasley.
4. 4/21/2017 Trust Funds' First Set of Interrogatories to Tammy Lasley.
5. 4/21/2017 Trust Funds' First Set of Requests for Production to Tammy Lasley.
6. 4/21/2017 Trust Funds' First Set of Interrogatories to Lightning Exhibits, LLC.
7. 4/21/2017 Trust Funds' First Set of Requests for Production to Lightning Exhibits, LLC.
8. 6/16/2017 Tammy Lasley's Response to Trust Funds' First Set of Admissions.
9. 6/16/2017 Tammy Lasley's Response to Trust Funds' First Set of Interrogatories.
10. 6/16/2017 Tammy Lasley's Response to Trust Funds' First Set of Requests for Production.
11. 6/16/2017 Lightning Exhibits, LLC's Response to First Set of Interrogatories.
12. 6/16/2017 Lightning Exhibits, LLC's Response to First Set of Requests for Production.
13. 6/16/2017 Defendants' First Supplemental to Initial Disclosures.
14. 6/23/2017 Trust Funds' Notice of Taking Deposition of Tammy Lasley.
15. 6/23/2017 Trust Funds' Notice of Taking Deposition of Lightning Exhibits, LLC.
16. 7/10/2017 Trust Funds' Notice of Subpoena Deposition of Brian Lasley.
17. 7/10/2017 Trust Funds' Notice of Subpoena Deposition of Michael Lasley.
18. 7/10/2017 Trust Funds' Notice of Subpoena Deposition of Frank Lasley, Sr.
19. 7/17/2017 Tammy Lasley's Supplemental Response to Trust Funds' First Set of Admissions.
20. 7/17/2017 Tammy Lasley's Supplemental Response to Trust Funds' First Set of Interrogatories.

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 (702) 382-2101

21. 7/17/2017 Lightning Exhibits, LLC's Supplemental Responses to First Set of Interrogatories.
22. 7/17/2017 Defendants Second Supplement to Initial Disclosures.
23. 9/26/2017 Trust Funds' Third Supplemental Disclosure.
24. 9/26/2017 Trust Funds' Deposition of Tammy Lasley.
25. 9/26/2017 Trust Funds' Deposition of Lightning Exhibits, LLC.
26. 9/26/2017 Trust Funds' Deposition of Brian Lasley.
27. 9/26/2017 Trust Funds' Deposition of Alyssa Carnegie.
28. 9/27/2017 Trust Funds' Deposition of Frank C. Lasley, Jr.
29. 9/27/2017 Trust Funds' Deposition of Steven Rosa.
30. 10/6/2017 Trust Funds' Second Set of Requests for Production to Tammy Lasley.
31. 10/6/2017 Trust Funds' Second Set of Requests for Production to Lightning Exhibits, LLC.
32. 10/12/2017 Defendants' First Set of Interrogatories to the Board of Trustees of the Teamsters Local 631 Security Fund for Southern Nevada.
33. 10/12/2017 Defendants' First Set of Interrogatories to the Board of Trustees of the Teamsters Convention Industry Training Fund.
34. 10/12/2017 Defendants' First Set of Requests for Production to Board of Trustees of the of the Teamsters 631 Security Fund for Southern Nevada
35. 10/12/2017 Defendants' First Set of Requests for Production to the Board of Trustees of the Teamsters Convention Industry Training Fund.
36. 10/20/2017 Trust Funds' Fourth Supplemental Disclosure.
37. 11/6/2017 Defendants' Third Supplemental Disclosure.
38. 11/6/2017 Tammy Lasley's Responses to Second Set of Requests for Production.
39. 11/6/2017 Lightning Exhibits, LLC's Responses to Second Set of Requests for Production.
40. 11/7/2017 Trust Funds' Deposition of Frank Lasley, Sr.

**B. DISCOVERY THAT NEEDS TO BE COMPLETED:**

1. Trust Fund's Responses to Defendants' First Set of Interrogatories to the Board of Trustees of the Teamsters Local 631 Security Fund for Southern Nevada.
2. Trust Fund's Responses to Defendants' First Set of Interrogatories to the Board of Trustees of the Teamsters Convention Industry Training Fund.

3. Trust Fund's Responses to Defendants' First Set of Requests for Production to Board of Trustees of the of the Teamsters 631 Security Fund for Southern Nevada

4. Trust Fund's Responses to Defendants' First Set of Requests for Production to the Board of Trustees of the Teamsters Convention Industry Training Fund.

**C. REASON DISCOVERY WAS NOT COMPLETED:**

The parties have been diligently attempting to conduct discovery, as demonstrated above. However, the deposition of Frank Lasley, Sr., was recently conducted and the parties will not have the deposition transcript until near the dispositive motion deadline. Moreover, both parties' counsel have very busy professional schedules over the holiday season, and would like to extend each other the professional courtesy of the extension in an effort to permit each other to spend time with their families during the upcoming holidays.

The parties have also began to engage in settlement discussions, and the extension to dispositive motion deadline will enable to the parties to explore the possibility of settlement more thoroughly. Lastly, the parties agree that with the pending request of extending the dispositive motion deadline, no prejudice will occur if the discovery cutoff deadline is extended by fourteen days to give the ability to all parties to ensure all relevant disclosures have been made and all responses to requests for written discovery have been submitted.

The request for an extension to the dispositive motion deadline is being made prior to twenty-one (21) days before the subject deadline. However, the parties acknowledge that the request for the extension of the discovery cutoff is not. The parties submit that good cause exists here to permit all parties to ensure that relevant disclosures are made and provide responses to outstanding discovery requests, especially if the dispositive motion deadline is extended until February 2018.

**D. CURRENT DISCOVERY SCHEDULE:**

- |                                |                   |
|--------------------------------|-------------------|
| 1. Discovery Cutoff:           | November 13, 2017 |
| 2. Dispositive Motion Deadline | December 13, 2017 |
| 3. Pretrial Order Deadline:    | January 12, 2018  |

**E. PROPOSED DISCOVERY SCHEDULE:**

1. Discovery Cutoff: November 27, 2017
2. New Disposition Motion Deadline: February 9, 2018
3. New Pretrial Order Deadline: March 14, 2018
4. In the event dispositive motion(s) are filed, the date for filing the joint pretrial order shall be suspended until 30 days after the Court enters a ruling on the dispositive motions, or otherwise by further order of the Court.

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100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106-4614  
(702) 382-2101

1 This is the parties' second request for an extension of the discovery deadline dates. The  
2 requested extension is not made to delay this matter, but made in the hopes of facilitating a  
3 resolution. Based upon the foregoing, the parties believe there is good cause for the requested  
4 extension.

5 BROWNSTEIN HYATT FARBER  
6 SCHRECK, LLP

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

7 /s/ Christopher M. Humes

/s/ Erica J. Chee

8 Adam P. Segal, Esq.  
Nevada Bar No. 6120  
9 Bryce C. Loveland, Esq.  
Nevada Bar No. 10132  
10 Christopher M. Humes, Esq.  
Nevada Bar No. 12782  
11 100 North City Parkway, Suite 1600  
12 Las Vegas, Nevada 89106-4614  
Telephone: (702) 382-2101  
13 Facsimile: (702) 382-8135  
14 *Attorneys for Plaintiffs*


Anthony L. Martin, Esq.  
Nevada Bar No. 08177  
Erica J. Chee, Esq.  
Nevada Bar No. 12238  
Wells Fargo Tower, Suite 1500  
3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
Telephone: 702.369.6800  
Facsimile: 702.369.6888  
*Attorney for Defendants*  
*Lightning Exhibits, LLC and Tammy L. Lasley*

15 Dated: November 13, 2017

Dated: November 13, 2017

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18 **ORDER**

19 **IT IS SO ORDERED.**

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21 **UNITED STATES DISTRICT/MAGISTRATE JUDGE**  
22 **CASE NO. 2:16-cv-03032-JAD-PAL**  
23 **DATED: \_\_ November 28, 2017**  
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